

LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL SMITH,

Plaintiffs,

VS.

CSAA FIRE AND CASUALTY
INSURANCE COMPANY,

Defendant.

No. 5:17-CV-1302D



* * * * *

DEPOSITION OF LISA M. HOLLIDAY, PH.D.,

TAKEN ON BEHALF OF THE PLAINTIFFS

ON APRIL 13, 2018

IN OKLAHOMA CITY, OKLAHOMA

COMMENCING AT 9:53 A.M.

* * * * *

REPORTED BY: KORTNEY V. HOUTS, CSR

instaScript

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PLAINTIFF'S
EXHIBIT

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Lisa M. Holliday, Ph.D.
4/13/2018

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<p style="text-align: right;">Page 150</p> <p>LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018</p> <p>1 the attic.</p> <p>2 Q What about behind the walls?</p> <p>3 A I generally don't tear up people's houses.</p> <p>4 Q But, I mean, if you've got -- if you have to</p> <p>5 make a determination --</p> <p>6 A We would -- we would probably leave, have a</p> <p>7 meeting, you know, talk to the client about we're going</p> <p>8 to have to do some destructive testing. Our</p> <p>9 investigations are generally limited to nondestructive</p> <p>10 testing. But on occasion, we have had to do</p> <p>11 destructive testing, and we -- that's not a call we</p> <p>12 make on the spot.</p> <p>13 Q Is that -- but that's something that -- if</p> <p>14 you have to gather that type of data, is that something</p> <p>15 that you'd be willing to do to make sure you got the</p> <p>16 right conclusion?</p> <p>17 A Yes.</p> <p>18 Q Because you --</p> <p>19 A And have.</p> <p>20 Q And so for Rimkus, you have done that.</p> <p>21 You've opened walls and that kind of thing?</p> <p>22 A I have.</p> <p>23 Q Do you recall that in the living room one of</p> <p>24 the joists had fell and you had to walk over a hump?</p> <p>25 A In the living room, the joist had failed?</p>	<p style="text-align: right;">Page 152</p> <p>LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018</p> <p>1 A We were not doing a full, thorough structural</p> <p>2 evaluation of the house.</p> <p>3 Q If you were walking through the -- well, if</p> <p>4 you're walking through the living room and you walked</p> <p>5 over a fallen floor joist and there was a trough in the</p> <p>6 floor, is that something that you would have wanted to</p> <p>7 investigate?</p> <p>8 A Probably just -- yes. But it seems like --</p> <p>9 if there would have been something that dramatic, yeah,</p> <p>10 it seems like they would have called an engineer</p> <p>11 themselves.</p> <p>12 Q If there was something --</p> <p>13 A If there was -- if I was a homeowner and</p> <p>14 there was a gaping hole in my floor, I would call an</p> <p>15 engineer.</p> <p>16 Q If there was a -- if there was something like</p> <p>17 that when you arrived at the Smiths', is that something</p> <p>18 you would have investigated in the crawlspace?</p> <p>19 A Yeah.</p> <p>20 Q Would that be -- would that be indicative of</p> <p>21 earthquake damage in that home?</p> <p>22 A No.</p> <p>23 Q You don't think so?</p> <p>24 A Not -- not the first signs of damage.</p> <p>25 Q Again, this would be something where you'd</p>
<p style="text-align: right;">Page 151</p> <p>LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018</p> <p>1 No.</p> <p>2 Q You don't remember --</p> <p>3 A There was lots of humps.</p> <p>4 Q What about a collapsed joist? Do you recall</p> <p>5 anything like that?</p> <p>6 A No.</p> <p>7 Q Do you recall whether or not you walked</p> <p>8 over -- when I say collapsed floor joist, do you</p> <p>9 understand what I'm referring to?</p> <p>10 A Well, I understand the technical meaning of</p> <p>11 collapsed. We certainly didn't see anything collapsed</p> <p>12 or any sign of anything collapsed there.</p> <p>13 Q If something had collapsed, what would that</p> <p>14 feel like when you're walking across the floor?</p> <p>15 A Collapse is a complete break of the member,</p> <p>16 and that would have been very obvious.</p> <p>17 Q What if it had fallen over? What would you</p> <p>18 call that?</p> <p>19 A Fallen over.</p> <p>20 Q Do you recall a fallen-over floor joist?</p> <p>21 A No.</p> <p>22 Q Do you recall walking over something that</p> <p>23 was -- were you looking for those types of things?</p> <p>24 A We were not.</p> <p>25 Q You weren't looking for fallen floor joists?</p>	<p style="text-align: right;">Page 153</p> <p>LISA M. HOLLIDAY, Ph.D. - APRIL 13, 2018</p> <p>1 have to have a fallen floor -- or some sort of floor</p> <p>2 failure, coupled with something else maybe higher.</p> <p>3 Correct?</p> <p>4 A Right.</p> <p>5 Q And if you saw something like that, then you</p> <p>6 would think, this might be earthquake?</p> <p>7 A I would think the kind of damage you're</p> <p>8 describing would be secondary.</p> <p>9 Q The floor damage?</p> <p>10 A The floor damage would probably be secondary.</p> <p>11 Something fell on it. Because that would not be the</p> <p>12 first -- that's not one of the first indications --</p> <p>13 that's not one of the first things that generally</p> <p>14 breaks with earthquake damage.</p> <p>15 Q And if I'm understanding this correctly, what</p> <p>16 you're saying is, if there was this secondary floor</p> <p>17 damage and then something up higher, which would be</p> <p>18 like a primary damaged thing, then you would be more</p> <p>19 inclined to say, this home was damaged by an</p> <p>20 earthquake?</p> <p>21 A I'm saying the way I can imagine that kind of</p> <p>22 damage happening is that an earthquake causing</p> <p>23 something to fall on that floor --</p> <p>24 Q Oh, I understand.</p> <p>25 A -- and cause that kind of damage.</p>